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*Interim Co-Lead Counsel for the Direct Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: TFT-LCD (FLAT PANEL)  
ANTITRUST LITIGATION

Master File No. M:07-1827 SI  
MDL No. 1827

This Document Relates To:  
  
ALL DIRECT PURCHASER ACTIONS

**STIPULATION AND [PROPOSED]  
ORDER FOR CONTINUANCE OF  
HEARING AND MODIFICATION OF  
BRIEFING SCHEDULE**

**STIPULATION**

**WHEREAS:**

1. Defendant Tatung Company of America (“Tatung”) has filed a motion pursuant to Rule 12(b)(1) and (6) of the Federal Rules of Civil Procedure to dismiss the Direct Purchaser Plaintiffs’ Consolidated Amended Complaint (the “Complaint”), scheduled for hearing before the Honorable Susan Illston on April 30, 2008, at 2:00 p.m. in accordance with Pretrial Order No. 5.

2. After conferring, Plaintiffs and Tatung agree that Plaintiffs should have a reasonable opportunity to conduct limited jurisdictional discovery for the purpose of opposing Tatung’s motion pursuant to Rule 12(b)(1).

3. Allowing time for Plaintiffs to conduct the contemplated discovery makes it necessary to continue the hearing of Tatung's motion and the briefing schedule set forth in Pretrial Order No. 5.

4. To accommodate the jurisdictional discovery, Plaintiffs and Tatung have agreed to seek a continuance of the scheduled motion hearing and related briefing.

5. Plaintiffs and Tatung will conduct discovery consistent with the Court's Order of September 25, 2007, staying most discovery. Plaintiffs believe it may be possible that discovery beyond the scope of that order will be required to oppose Tatung's motion. If so, Plaintiffs will raise this issue with the Court on notice to all parties and the Department of Justice.

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs and Tatung, by and through their undersigned counsel, subject to the Court's approval, as follows:

1. Pretrial Order No. 5 shall be modified as follows:

- (a) Plaintiffs shall serve and file their opposition to Tatung's motion to dismiss within 120 days after entry of an Order approving this Stipulation, or by any subsequent date that may be ordered by the Court;
- (b) Tatung shall serve and file any reply no later than 21 days after Plaintiffs have served and filed their opposition; and
- (c) The hearing on Tatung's motion to dismiss, now scheduled for April 30, 2008, at 2:00 p.m., shall be continued to the earliest date available on the Court's calendar that will accommodate the briefing schedule in place pursuant to this Stipulation and will comply with the Court's Local Rule 7-3(c), which requires Tatung's reply to be filed at least 14 days before the hearing.

2. Plaintiffs and Tatung shall each make a good-faith effort to accomplish the jurisdictional discovery contemplated by this Stipulation in time to comply with the proposed briefing schedule. Should it become apparent to either Plaintiffs or Tatung that the jurisdictional discovery contemplated by this Stipulation will not be completed in time to comply with the

1 modified briefing schedule set forth in this Stipulation, then either party may move the Court for a  
2 reasonable continuance of the briefing schedule and a corresponding continuance of the hearing  
3 on Tatung's motion to dismiss.

4 3. Plaintiffs and Tatung fully reserve all of their claims, defenses and rights in  
5 the above-captioned litigation.

6 It is so stipulated and requested.

7 Dated: March 25, 2008

LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP

8  
9 By: /s/ Richard M. Heimann  
Richard M. Heimann

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17 *Interim Co-Lead Counsel for the Direct Purchaser Plaintiffs*

18 Dated: March 25, 2008

BAKER & McKENZIE LLP

19  
20 By: /s/ Patrick J. Ahern  
Patrick J. Ahern

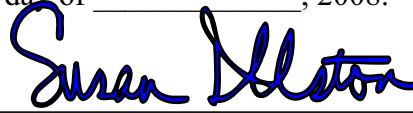
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24 *Counsel for Defendant Tatung Company of America*

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26 Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the  
27 filing of this document has been obtained from Richard M. Heimann and Patrick J. Ahern.  
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**ORDER**

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2008.



HONORABLE SUSAN ILLSTON  
United States District Judge

Motion #470 has been continued to Friday, September 5,  
2008, at 9:00 a.m.